1	James Q. Taylor-Copeland (284743)	Damien J. Marshall (pro hac vice)		
2	james@taylorcopelandlaw.com TAYLOR-COPELAND LAW	dmarshall@kslaw.com Andrew Michaelson (<i>pro hac vice</i>)		
	501 W. Broadway, Suite 800	amichaelson@kslaw.com		
3	San Diego, CA 92101 Telephone: (619) 400-4944	KING & SPALDING LLP 1185 Avenue of the Americas, 34th Floor		
4	Facsimile: (619) 566-4341	New York, NY 10036		
5	Marc M. Seltzer (54534)	Telephone: (212) 556-2100 Facsimile: (212) 556-2222		
	mseltzer@susmangodfrey.com	, ,		
6	Steven G. Sklaver (237612) ssklaver@susmangodfrey.com	Suzanne E. Nero (284894) snero@kslaw.com		
7	Oleg Elkhunovich (269238)	KING & SPALDING LLP		
o	oelkhunovich@susmangodfrey.com	50 California Street, Suite 3300		
8	Krysta Kauble Pachman (280951) kpachman@susmangodfrey.com	San Francisco, CA 94111 Telephone: (415) 318-1200		
9	Nicholas N. Spear (304281)	Facsimile: (415) 318-1300		
10	nspear@susmangodfrey.com SUSMAN GODFREY L.L.P.	Attornous for Defondants Pinnle Labs Inc		
10	1900 Avenue of the Stars, 14th Floor	Attorneys for Defendants Ripple Labs Inc., XRP II, LLC, and Bradley Garlinghouse		
11	Los Angeles, CA 90067	, 0		
12	Telephone: (310) 789-3100 Facsimile: (310) 789-3150	Michael A. Hanin mhanin@kasowitz.com		
12	1 acsimile. (310) 767-3130	KASOWITZ BENSON TORRES LLP		
13	Attorneys for Lead Plaintiff Bradley Sostack	1633 Broadway		
14	[Additional Counsel Included on Signature	New York, New York 10019 Telephone: (212) 506-1788		
	Pages]	. , ,		
15		Attorney for GSR Holdings, Inc.		
16	IMITED STATES	DISTRICT COLIDT		
17				
18	NORTHERN DISTR	ICT OF CALIFORNIA		
19	OAKLAND DIVISION			
	In re RIPPLE LABS INC. LITIGATION,	<u>DISCOVERY MATTER</u>		
20		Case No. 18-cv-06753-PJH		
21	This Document Relates To:	STIPULATION AND [PROPOSED]		
22	ALL ACTIONS	ORDER TO EXTEND TIME OF MOTION FOR RELIEF FOR GSR		
23		HOLDINGS, INC.		
24				
25				
26				
27				
28	STIDI II ATED [DDODOSED] ODDED TO EVTEND	TIME TO OBJECT TO THIRD PARTY DISCOVERY		

Pursuant to Civ. L.R. 6-2, Lead Plaintiff Bradley Sostack ("Plaintiff"), Defendants Ripple Labs Inc, XRP II, LLC, and Bradley Garlinghouse (collectively, "Defendants"), and GSR Holdings, Inc. ("GSR") hereby stipulate as follows:

WHEREAS, on April 28, 2022, the Court ordered that Defendants produce all documents and written discovery produced in *Securities and Exchange Commission v. Ripple Labs, Inc.*, 20 Civ. 10832 (AT), S.D.N.Y) (the "SEC Action") and that Plaintiff must provide notice to all relevant third parties who have not previously consented to production within seven days of the Order (the "April 28, 2022 Order");

WHEREAS, in the April 28, 2022 Order, the Court also ordered that any third party who does not consent to production must notify both Plaintiff and Defendants of their intent to object within fourteen days of receipt of the notice and must file any motion for relief within twenty-one days of receipt of such notice;

WHEREAS, on May 4, 2022, Plaintiff provided notice of the April 28, 2022 Order to GSR, a third party in this matter who produced documents in the SEC Action;

WHEREAS, GSR timely notified Plaintiff and Defendants of its intent to object to production by May 18, 2022, and any motion for relief is due on May 25, 2022;

WHEREAS, Plaintiff and GSR are in the process of meeting and conferring about the documents that GSR will produce to Plaintiff pursuant to the April 28, 2022 Order;

WHEREAS, the parties request to extend the May 25, 2022 deadline for GSR to seek relief from the Court to allow the parties to continue to meet and confer productively; and

WHEREAS, granting this extension is not expected to affect the schedule for the matter.

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between Lead Plaintiff, Defendants, and GSR, through their respective counsel, that:

1	1. GSR's deadline to move the	Court for relief from its April 28, 2022 Order is extended
2	until June 2, 2022.	
3	Dated: May 24, 2022	By: /s/ Nicholas N. Spear
4		James Q. Taylor-Copeland (284743) james@taylorcopelandlaw.com
5		TAYLOR-COPELAND LAW 501 W. Broadway, Suite 800
6		San Diego, CA 92101 Telephone: (619) 400-4944
7		Facsimile: (619) 566-4341
8		Marc M. Seltzer (54534) mseltzer@susmangodfrey.com
9		Steven G. Sklaver (237612) ssklaver@susmangodfrey.com
10		Oleg Elkhunovich (269238) oelkhunovich@susmangodfrey.com
11		Krysta Kauble Pachman (280951) kpachman@susmangodfrey.com
12		Nicholas N. Spear (304281) nspear@susmangodfrey.com
13		SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, 14th Floor
14		Los Angeles, CA 90067 Telephone: (310) 789-3100
15		Facsimile: (310) 789-3150
16		P. Ryan Burningham (<i>pro hac vice</i>) rburningham@susmangodfrey.com
17		SUSMAN GODFREY L.L.P. 1201 Third Avenue, Suite 3800 Seattle, WA 98101
18		Telephone: (206) 516-3880 Facsimile: 206) 516-3883
19		Attorneys for Lead Plaintiff Bradley Sostack
20		
21	Dated: May 24, 2022	By: <u>/s/ Suzanne E. Nero</u> Damien J. Marshall (pro hac vice)
22		dmarshall@kslaw.com Andrew Michaelson (<i>pro hac vice</i>)
23		amichaelson@kslaw.com KING & SPALDING LLP
24		1185 Avenue of the Americas, 34th Floor New York, NY 10036
25		Telephone: (212) 556-2100 Facsimile: (212) 556-2222
26		Suzanne E. Nero (284894)
27		snero@kslaw.com KING & SPALDING LLP
28		50 California Street, Suite 3300
		2 EXTEND TIME TO OBJECT TO THIRD PARTY DISCOVERY

CASE NO. 18-cv-06753-PJH

Case 4:18-cv-06753-PJH Document 172 Filed 05/24/22 Page 4 of 6

		· ·
1		San Francisco, CA 94111 Telephone: (415) 318-1200 Facsimile: (415) 318-1300
2		
3 4		Andrew J. Ceresney (pro hac vice) aceresney@debevoise.com DEBEVOISE & PLIMPTON LLP
		919 Third Avenue New York, NY 10022
5		Telephone: (212) 909-6000 Facsimile: (212) 909-6836
6		Attorneys for Defendants Ripple Labs Inc.,
7		XRP II, LLC, and Bradley Garlinghouse
8	Datad: May 24, 2022	Dry /g/Michael A Hanin
9	Dated: May 24, 2022	By: /s/ Michael A. Hanin Michael A. Hanin
10		mhanin@kasowitz.com KASOWITZ BENSON TORRES LLP
11		1633 Broadway New York, New York 10019
12		Telephone: (212) 506-1788
13		Attorney for GSR Holdings, Inc.
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
40	CLIDITI VLED (DDODOGED) OBDED T	3 O EXTEND TIME TO OBJECT TO THIRD PARTY DISCOVERY
		ASE NO. 18-cv-06753-PJH
J	10623895v1/016433	

	Case 4.10 cv 00/30 f of 1 Bodament 1/2 f fled 03/24/22 f age 3 of 0		
1	[PROPOSED] ORDER		
2	PURSUANT TO STIPULATION, IT IS SO ORDERED.		
3			
4	Dated:		
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28	4		
	STIPULATED [PROPOSED] ORDER TO EXTEND TIME TO OBJECT TO THIRD PARTY DISCOVERY CASE NO. 18-cv-06753-PJH		

10623895v1/016433

1	ATTESTATION			
1	Pursuant to Civil Local Rule 5-1(i)(3) re	Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the		
2	filing of this document has been obtained from	filing of this document has been obtained from the other signatories.		
3	DATED: May 24, 2022 /s	/ Nicholas N. Spear		
4	- 1.	icholas N. Spear		
5	5			
6				
7				
8	8			
9	9			
10	10			
11	11			
12	12			
13	13			
14	14			
15	15			
16	16			
17	17			
18	18			
19	19			
20	20			
21	21			
22	22			
23	23			
24	24			
25	25			
26	26			
27	27			
28	28	1		
	STIPULATED [PROPOSED] ORDER TO EXTEND	TIME TO OBJECT TO THIRD PARTY DISCOVERY		

10623895v1/016433